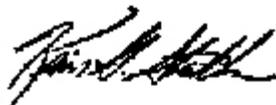
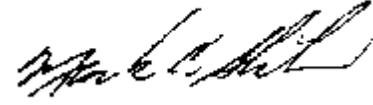


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PROGRAM INFORMATION BULLETIN NO. P08-16

FROM: KEVIN G. STRICKLIN 
Administrator for
Coal Mine Safety and Health

MARK E. SKILES 
Director of Technical Support

SUBJECT: Clarification of Procedures to Use When Reporting SCSR Inventories

Who needs this information?

This Program Information Bulletin (PIB) is intended for underground coal mine operators, independent contractors, miners' representatives, Mine Safety and Health Administration (MSHA) personnel, and other interested parties.

What is the purpose of this PIB?

This PIB informs the coal mining industry regarding the proper procedures to use to report Self-Contained Self-Rescuers (SCSRs) using the MSHA database accessed through the MSHA home page at www.msha.gov. Since the development of the database in 2007, over 100,000 SCSRs have been entered into the system. During this period, MSHA has made several improvements to facilitate the entry of SCSRs into the database by mine operators and identified problems with some inventory submittals.

A malfunction in the Department of Labor (DOL) mail server for a period of time in the past year prevented some e-mailed inventories that were sent to SCSR.Inventory@dol.gov from being delivered to MSHA. Operators should check their inventories on-line at <http://www.msha.gov> to confirm that their SCSRs have been added to the database. If not, we request that you resend your SCSR inventory to the same address (or submit it on-line using the electronic form) so that MSHA can accurately update the SCSR database as required by Title 30, Code of Federal Regulations (30 C.F.R.) § 75.1714-8.

Information

Section 75.1714-8(a) requires mine operators to provide MSHA with a complete inventory of all SCSRs as defined in 30 C.F.R. § 75.1714-1 at each mine. Operators were required to submit the inventory within the first quarter of 2007 for existing mines and within 3 months of beginning operation at new mines. Section 75.1714-8(a) (1) requires that the inventory include the mine name, MSHA mine ID number, mine location, and, for each SCSR unit, the manufacturer, the model type, the date of manufacture, and the serial number. Section 75.1714-8(a) (2) requires mine operators to update the inventory. Operators must report only the change to the inventory to MSHA within the quarter that the change occurred. This requirement keeps the database current and assists mine operators in complying with 30 C.F.R. § 75.1714-3. Also, consistent with other sections of this regulation, this provision specifies calendar quarters for reporting, i.e., Jan-Mar, Apr-Jun, Jul-Sep, and Oct-Dec.

Detailed instructions are provided to users when accessing the SCSR Inventory/Report on the MSHA web page, using their eGov password and Mine ID. Users can input their inventory on the optional electronic form and file on-line (preferred method and fastest submission option). Using the electronic form, users can add one or more SCSRs to their inventory, modify an SCSR entry in the inventory, remove SCSRs from the inventory, or import several SCSRs using a spreadsheet. Any electronic submissions will be certified and updated in the database within two (2) business days.

Multiple SCSRs can also be added to the inventory database utilizing a properly formatted spreadsheet attached to an e-mail and submit to: [zzMSHA-Scsr.Inventory](#). In addition, mine operators can also print a form and either fax it to: (412) 386-6928, or mail it to:

Mine Safety and Health Administration
Technical Support
Pittsburgh Safety and Health Technology Center
Attn: SCSR Coordinator
Cochrans Mill Road
P.O. Box 18233
Pittsburgh, PA 15236

However, these options can take much more time to process than electronic submittals, and several problems have been identified as outlined below.

Key problems encountered by mine operators in submitting SCSR inventories by e-mail or fax to MSHA include the following:

1. E-mails with attachments sent to SCSR.Inventory@dol.gov may have unintentionally been blocked, so inventory lists were never delivered to MSHA.

Solution: Operators need to check their on-line SCSR inventory (for detailed instructions, go to <http://www.msha.gov>, click on SCSR Inventory/Report, click on Detailed Instructions). If previously submitted SCSR data is not found in the database, you will need to resend your inventory, either to SCSR.Inventory@dol.gov, or using the electronic form.

2. Inventories submitted by e-mail or fax are often missing contact information; all incomplete inventories are returned to the operator for correction and need to be resubmitted.

Solution: Use the electronic form. When submitting SCSR data on-line, the inventory system will not allow incomplete information to be entered. When submitting information by email or fax, make sure that you include: 1) mine name, 2) mine ID, 3) company name, 4) address, 5) contact name, and 5) the telephone number for your contact. Submitted inventories that are handwritten are often not legible; faxed copies can be smeared and not readable; and typing or handwriting is sometimes small and hard to read. These types of inventories are also returned to the operator for correction and need to be resubmitted.

Use the electronic form. The use of the on-line system will minimize errors and is a more efficient way to submit SCSR data.

Additional guidance on what should and should not be submitted to the SCSR inventory:

1. Submitted inventories should only include SCSRs used in the mine, including those units on mantrips and mobile equipment.

Clarification: SCSRs not in use, such as those in warehouses, do not have to be reported.

2. Submitted inventories, including those utilizing properly formatted spreadsheets, should only include the information required on the MSHA Form 2000-222.

Suggestion: Use the electronic form. The on-line system will not permit entry of data that is not required.

3. Operators should only submit one MSHA Form 2000-222 per mine ID inventory, and attach a list of any additional units if there is more than one SCSR at that location.

Suggestion: Use the electronic form. When submitting SCSR data on-line, the inventory system will allow for the entry of one unit or multiple entries by importing the information from any attached list.

4. Submitted inventories that contain SCSRs purchased or transferred from one mine to another mine are being recognized as duplicates by serial number, and the system will not accept the addition to the inventory.

Solution: Use the electronic form. The system will immediately identify attempts to enter duplicates. Sold or transferred SCSRs need to be removed from the inventory of one mine ID before being re-entered into the database under another mine ID. SCSRs can readily be transferred from one mine ID inventory and entered into another by operators who have rights to access these mine IDs

5. Submitted inventories that include SCSRs taken out of service need to state a reason for the SCSR being taken out of service. MSHA Form 2000-222 provides a list of the reasons.

Suggestion: Use of the electronic form to submit will ensure that this requirement is not overlooked.

6. After the initial inventory is submitted, the required quarterly updates should include only SCSRs that are either removed from service or new additions to the in-mine inventory.

Clarification: If there is no change to report, the operator does not have to submit any quarterly update to MSHA. Only changes are to be submitted each quarter, not entire inventories.

7. Submission of inventories with typographical errors in the SCSR serial numbers frequently leads to system duplicates with SCSR serial numbers that are submitted by other operators.

Suggestion: Submittal by electronic form will immediately identify the duplicates. After assuring which operator has the incorrect serial number, the operator with the error will be contacted to remove the erroneous serial number from their inventory.

8. In response to the 30 C.F.R § 75.1714-8 requirement that mines “submit to MSHA” or “report the change to MSHA”, mines have handed inventories to Coal Mine Safety and Health inspectors and considered that to be their official submittal to MSHA.

Clarification: All SCSR inventories must be submitted ONLY to MSHA’s Technical Support through on-line submission, mail, or fax. Inventories handed to Coal Mine Safety and Health personnel will not be accepted.

What is the background for this PIB?

In the past, MSHA has discovered problems with all brands of SCSRs. Sometimes, these problems were related to specific production runs that generated unique serial numbers for the SCSRs. Sometimes, the problems affected SCSRs from one manufacturer. During past recalls, MSHA had problems locating outdated or nonworking SCSRs. MSHA inspectors had to travel to each mine to examine each SCSR to make sure all affected devices were actually removed from service. With the Emergency Mine Evacuation Final Rule and the MINER Act requiring a significant number of additional SCSRs, a centralized database can facilitate the identification of problem SCSRs. MSHA can then expeditiously inform the affected mine operator and ensure that these SCSRs are removed from service before miners attempt to use them in a mine emergency.

Several mine operators have reported difficulty inputting their SCSR inventories into the MSHA database. Past problems include: 1) a recently identified DOL server malfunction prevented delivery of inventory lists to MSHA, 2) mine operators not providing sufficient information, 3) unnecessary submittals of complete inventories when only quarterly updates are required, 4) some mine operators are not validating that their on-line inventory is correct, and 5) mine operator submission of inventories with typographical errors in the SCSR serial numbers resulting in system duplications. This PIB clarifies procedures to follow to assist mine operators in getting their SCSR inventories entered into the database, and provides examples of some typical problems that have been encountered in the past year in populating the database.

What is the authority for this PIB?

The Federal Mine Safety and Health Act of 1977; as amended, 30 U.S.C. § 801 et seq.; 30 C.F.R. §§ 75.1714-8.

Who is the contact person for this PIB?

Technical Support

Jeffery H. Kravitz, (412) 386-6923

E-mail: Kravitz.jeffery@dol.gov

Coal Mine Safety and Health

Monty Cristo (202) 693-9527

christo.monty@dol.gov

Is this PIB on the Internet?

This PIB may be viewed on the Internet by accessing MSHA's home page at <http://www.msha.gov> then choosing "Compliance Info" and "Program Information Bulletins."

Who will receive this PIB?

MSHA Program Policy Manual Holders

Underground Coal Mine Operators

Miners' Representatives

Independent Contractors

Special Interest Groups